BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

COMPANY	Y, INC.	, and EDWA	ARD P. STOREY,)		
		Co	mplainants,)	,)	
v.)	Case No. WC-2007-0303	
AQUA MIS	SSOUR	I, INC.)		
		Re	spondent.)		
		COMPLA	INANTS' STATEN	MENT OF	<u>POSITION</u>	
1.	Is the	e Quail Valley	Waste Water Treatn	nent Facility	capable of handling an additional	
32 homes?						
	a.	If not, how	v many more can it h	andle?		
CON	MPLAI	NANTS:			nt the facility can handle 40 urrent census for a total of 120	

2. If not, who is responsible for expanding the plant?

homes.

COMPLAINANTS:

Developer is willing to extend mains to those lots which do not have mains to them. Aqua would have to expand the capacity of the plant as the plant was designed and built to handle the entire development.

3. Did Complainants apply for additional hookups and, if so, did Respondent deny such application?

COMPLAINANTS:

Yes. Ed Storey was told that 80 homes was all that could be connected.

4. If Complainants did apply for additional hookups, how many were applied for?

COMPLAINANTS:

Complainants orally requested additional hookups and were denied. Subsequently, after engineering studies were performed, Complaints requested 10 hookups immediately with others to follow.

5. If Respondent did deny such application, was Respondent's denial of additional hookups wrongful, intentional, and without just cause or excuse?

COMPLAINANTS:

Yes.

6. What was the original designed capacity of the Waste Water Treatment Facility?

COMPLAINANTS:

The facility was designed and built to handle the entire development of Quail Valley.

CARSON & COIL, P.C.

Mark A. Ludwig #31

515 East High P.O. Box 28

Jefferson City, MO 65102

573-636-2177

573-636-7119 (fax)

ATTORNEYS FOR COMPLAINANTS